Complaint Management Policy
Wyndham Vacation Resorts South Pacific Ltd and Wyndham Destinations Asia Pacific Pty Ltd (jointly referred to as “Wyndham”)

Parent Policy
Conduct and Compliance Policy

1 Introduction
Wyndham recognises that receiving, analysing and responding to customer complaints provides the organisation with an important opportunity to identify potential business, information and service improvements. Wyndham also has a responsibility to be responsive to you and treat your concerns efficiently, confidentially, fairly and transparently.

This policy explains how Wyndham will manage your complaint, to ensure that all complaints are acknowledged and responded to within appropriate guidelines and according to documented processes.

The policy includes:

- definition of a complaint
- principles guiding how Wyndham will manage your complaint
- how Wyndham deals with the personal information you provide
- what constitutes unreasonable complainant conduct
- the process of annual system audit and review
- how Wyndham seeks your feedback on its complaints handling process and
- where overall accountability for complaints handling resides within Wyndham.

This policy can be updated and amended from time to time by Wyndham at its absolute discretion. The current policy can be found on the Wyndham website at www.wyndhamap.com
2 Definitions

A complaint is any expression of dissatisfaction. Wyndham categories feedback that it receives as follows:

<table>
<thead>
<tr>
<th>Feedback Type</th>
<th>Description</th>
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<tbody>
<tr>
<td><strong>Critical</strong></td>
<td>Any complaint which has a potential of financial loss to a customer or regulatory concerns for the business regarding serious misconduct</td>
</tr>
<tr>
<td>Escalated to Customer Care All other complaints to be sent to <a href="mailto:CustomerTeam@wyn.com">CustomerTeam@wyn.com</a></td>
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<tr>
<td><strong>High</strong></td>
<td>Any complaint escalated to a Team Leader, Supervisor or Manager where requested by the complainant.</td>
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<tr>
<td>Escalate to: Department Senior Manager, Manager or Supervisor</td>
<td></td>
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<tr>
<td><strong>Medium</strong></td>
<td>Any complaint relating to general operational issues that is able to be resolved within the department</td>
</tr>
<tr>
<td>Escalate to: Department Team Leaders</td>
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<tr>
<td><strong>General Feedback</strong></td>
<td>Constructive information shared in order to improve Wyndham’s product or service</td>
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<tr>
<td>Direct to: Department Team Leader</td>
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</table>

3 Scope

This policy applies to all Wyndham employees when dealing with complaints by any consumer.

4 Policy Statement

To ensure a consistent approach to the management and reporting of all complaints and feedback across the business; to establish more accurate insights from all complaints/issues; and increasing the capability to drive change so Wyndham can design its product, service & customer experience based on what is important to our customers.
Wyndham seeks to ensure that all complaints are managed in accordance with the following principles:

4.1 Accessibility

Wyndham is committed to making its complaints management process accessible to all. Wherever possible, extra assistance is also available to complainants who may require particular assistance in making a complaint. Wyndham is also committed to ensuring that staff understand this policy and abide by it when managing any complaint.

4.2 Responsiveness

Wyndham is committed to being responsive to complaints in both how it manages them and in how it uses complaints to continuously improve its services and programs.

4.3 Confidentiality

Wyndham is committed to maintaining confidentiality when managing complaints and will handle and maintain any personal information it receives in accordance with its Privacy Policy. Wyndham does not confirm or deny the receipt of a complaint, the details of any complaint, or any resolution of the complaint with any other party except as required by law or with your consent.

4.4 Fairness

Wyndham is committed to managing complaints fairly and with integrity, and will maintain impartiality and treat all complainants with respect. Complainants have an opportunity to respond and seek a review of Wyndham’s response. Internal reviews of complaints will be undertaken by Wyndham via an approved escalation process.

4.5 Transparency

Wyndham is committed to transparency in all aspects of its complaints management process. This policy outlines how Wyndham manages complaints. When responding to a complainant, Wyndham will explain the assessment undertaken and the decision reached. Complaints will be properly recorded and this data used to meet Wyndham’s regulatory reporting requirements.

4.6 Efficiency

Wyndham is committed to managing complaints as efficiently as possible. Wyndham will acknowledge receipt of any complaint within 48 hours.

Where a complaint is critical and complex in nature Wyndham may require further time to investigate the Complainants concerns. If the complaint involves financial hardship or a credit default, under the National Consumer Credit Code (NCCP), the
Complainant must receive a final written response/decision within 21 days from the day the complaint is received.

For all other Critical complaints the complainant must receive a final written response/decision within 45 days from the day the complaint is received.

5 Rights and Responsibilities

There are certain rights and responsibilities that a complainant can expect in the management of their complaint. Wyndham also maintains some rights and responsibilities.

5.1 Complainant Rights

You have the right to:

- make a complaint
- be treated with courtesy and respect by Wyndham staff
- have your complaint managed in line with Wyndham’s complaint management policy and procedures
- seek an internal review of Wyndham’s response if you are not satisfied with the response or the process undertaken
- seek an external review of Wyndham’s internal review response by an external dispute resolution scheme
- withdraw your complaint at any time.

5.2 Complainant Responsibilities

You have a responsibility to:

- treat Wyndham staff with courtesy and respect
- provide only true and accurate information
- assist Wyndham in the management of your complaint by:
  - providing sufficient information to enable Wyndham to investigate the matter; and
  - provide further information if requested.

5.3 Wyndham Rights

Wyndham has the right to:

- have its employees treated with courtesy and respect; and
- investigate a complaint even if it has been withdrawn by a complainant.
5.4 Wyndham Responsibilities

Wyndham has responsibility to:

- support complainants' rights to complain; protect complainants' privacy; and treat the matter with discretion, if requested
- manage a complaint in line with the complaint management policy and procedures
- provide complainants with a timely response
- provide complainants an avenue for internal review
- provide complainants an avenue for external review
- co-operate with any request for information by any government or regulatory organisation as a result of a complainant's external appeal of any decision made by Wyndham.

6 Use of Personal Information

Wyndham will keep a record of all complaints received and the outcome of all internal reviews undertaken. All personal information collected for the purpose of managing a complaint or conducting an internal review will be dealt with in accordance with Wyndham’s Privacy Policy.

Personal information collected during the complaint and/or complaint review process, will usually only be disclosed to the Wyndham business areas to which the complaint relates, and to staff members involved in managing the complaint or internal review. Where Wyndham is obliged to report details of the complaint or complaint review outcome to another agency, such as the Credit and Investment Ombudsman, details may be disclosed as part of a report to that agency or as otherwise required at law.

7 Dealing with Unreasonable Conduct by Complainants

Almost all complainants are making a complaint due to the fact that they feel very strongly about their issue. In some instances, they will be very upset, angry or challenging and it will not be assumed that a ‘difficult’ complainant doesn’t have a valid complaint. However, if the complainants’ behaviour becomes unreasonable or threatening, Wyndham may decide to terminate any further correspondence or contact on a case by case basis, in consultation with Wyndham’s legal counsel.

Unreasonable behaviour by a complainant can be classified as (and is not limited to) verbally abusive behaviours or threats of physical harm or violence. Unreasonable behaviour can also include bombarding the organisation with unnecessary and excessive phone calls and emails or vexatious complaints.

8 Complaint Handling Procedures

Wyndham has strict guidelines in place to handle all complaints.
9 Escalated Dispute Resolution Procedure

If you are not satisfied with the outcome of the investigation you may request a review of your complaint to be undertaken by an External Dispute Resolution Scheme (i.e. Australian Financial Complaints Authority (AFCA) Financial Services Complaints Limited (FSCL)).

10 Complainant feedback tool

To identify the level of satisfaction of complainants with how their complaint has been handled, Wyndham will establish an online satisfaction survey tool. The tool will provide you with the opportunity to provide feedback on the way your complaint was handled. This feedback will form part of the system audit conducted on an annual basis.

11 System Audit and Reviews

Wyndham has a centralised system within which all data is collected to help build business insights and recommendations for consideration/approval of the Executive Management Group as soon as is practical. Every year, a person not associated with the complaints procedures and who has appropriate skills, will be tasked with undertaking an audit of the system.

12 Overall Accountability for Complaints Handling within Wyndham

Although there are a number of key stakeholders involved in the complaints handling process within Wyndham, the person with direct accountability for all aspects of complaints handling is the Manager, Customer Care Team.

13 Policy Endorsement

<table>
<thead>
<tr>
<th>Date approved:</th>
<th>Date Policy will take effect:</th>
<th>Date of Next Review:</th>
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<tr>
<td>6th July, 2017</td>
<td>6th July, 2017</td>
<td>6th January, 2018</td>
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Approved by: Executive Management Group

Custodian: Customer Experience Team

Responsible Branch: Communication, Education and Research
Supporting documents, procedures & forms of this policy:

- Privacy policy
- Complaint Management Policy

Audience: All Customers

14 Version control and change history

<table>
<thead>
<tr>
<th>Version Control</th>
<th>Date Effective</th>
<th>Approved By</th>
<th>Amendment</th>
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<tr>
<td>1</td>
<td>6/7/17</td>
<td>Customer Care Manager</td>
<td></td>
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<tr>
<td>2</td>
<td>20/9/18</td>
<td>Customer Operations</td>
<td></td>
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<tr>
<td>3</td>
<td>1/3/19</td>
<td>Customer Operations</td>
<td>Customer Operations Manager</td>
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